

# **EXHIBIT G**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

Donna Curling, et al.,

Plaintiffs,

CIVIL ACTION FILE

vs.

NO. 1:17-cv-02989-AT

Brad Raffensberger, et  
al.,

Defendants.

~~~~~

VIDEO 30(b)(6) DEPOSITION OF  
SECRETARY OF STATE  
THROUGH  
ROBERT GABRIEL STERLING

October 12, 2022  
9:26 a.m.

Suite 3250, One Atlantic Center  
1201 W. Peachtree Street  
Atlanta, Georgia

S. Julie Friedman, CCR-B-1476

1 can have confidence in the outcomes, and the  
2 election is run well. That's the overall  
3 rationale behind doing that.

4 I got a thumbs up from the court reporter,  
5 People. I was good. I did good.

6 MR. KNAPP: Now keep up your record.

7 THE WITNESS: That's going to be hard.  
8 Dave's going to ask me questions and get me  
9 irritated, and I'll get ramped up again.

10 Q. (By Mr. Cross) Do you know whether anyone  
11 has looked at any of the voting equipment taken from  
12 Coffee County to determine whether any kind of  
13 malware was tested on the system?

14 A. Not yet. I think we're discussing about  
15 trying to -- I'm working on getting a long-term  
16 contract, Pro V & V, through our procurement process  
17 to allow for us to go, through, do investigations  
18 like that. Potentially, we had discussion about  
19 potentially Fortalice coming in or some other  
20 third-party group to look just to assure that; and  
21 then if there is anything, loading a golden record;  
22 and even if there's not any discussion about loading  
23 a new golden record on.

24 And subsequently, as I mentioned before,  
25 we're looking at moving to 5.17 on Democracy Suite

1 from Dominion; and they can be wiped and reloaded  
2 with that afterwards, too. So there's different ways  
3 we can go about this; but I would like to -- I think  
4 we would like to know if anything like that did  
5 occur.

6 Q. Do you know whether anyone has looked to  
7 see whether a back door was created to the EMS server  
8 or any of the other voting equipment through the  
9 folks that were there on January 2021 in Coffee  
10 County?

11 A. I would not have knowledge of that right  
12 now, because, again, it's been handed over to the  
13 GBI.

14 Q. What -- Who made the decision to bring in  
15 Mr. Persinger?

16 MR. TYSON: I believe he's already  
17 answered that.

18 THE WITNESS: I did.

19 Q. (By Mr. Cross) Sorry.

20 A. I said it was basically Ryan Germany and  
21 myself.

22 Q. Oh, I'm sorry.

23 A. Yes.

24 Q. You did.

25 A. Right.

1 means.

2 But you can answer, if you know.

3 THE WITNESS: Okay. I'm sorry. Can you  
4 restate it. You guys threw me off. I -- I  
5 apologize.

6 Q. (By Mr. Cross) Sure. Sure.

7 Is it your understanding that Dr.  
8 Halderman's concern with vulnerabilities that he  
9 found with the Dominion software, which, again,  
10 validated by CISA, that his concern is only that  
11 they're exploited; or do you also understand that  
12 he's concerned that individuals like Sidney Powell  
13 and others who will spread misinformation will use  
14 those vulnerabilities, the presence, just the mere  
15 presence to undermine voter confidence?

16 MR. TYSON: Object to form and to scope.

17 THE WITNESS: I won't necessarily go to  
18 Mr. Halderman's mind-set; 'cause as I said  
19 before, I can't know what's in anybody's mind.  
20 However, your characterization is likely true  
21 and accurate; but I mean, it's going to be a  
22 personal opinion. It sort of lacks  
23 self-awareness in some ways that every system  
24 has vulnerabilities, and you have to mitigate  
25 with processes and procedures around every

1 system that exists.

2 So there's a level of vulnerability and a  
3 level of processing around it, and we've seen  
4 some of these things before, and there was one  
5 specific thing that was exploited by the Trump  
6 people in Antrim County where they -- A  
7 election director made a mistake or a series of  
8 five mistakes that led to incorrect outcomes  
9 being displayed, and that was then obviously  
10 exploited.

11 As we know, any claims need to be handled  
12 responsibly and -- Excuse me. Any claim can be  
13 handled responsibly.

14 So yes. I believe that's probably Mr.  
15 Halderman's view is that by showing these, he's  
16 heading off those things and trying to find ways  
17 to mitigate them; and like I said, version 5.17  
18 will go a long way towards doing many of those  
19 things, I believe.

20 So my overall point is that, yes. I  
21 believe he's correct, to answer your question,  
22 or that that's his mind-set.

23 But I also know that making the claims,  
24 depending on how you do it and the way you do it  
25 and the ways to achieve it responsibly and --

1 and this is going to -- Lawsuits in and of  
2 themselves are adversarial, obviously; and it  
3 becomes difficult in many ways sometimes to just  
4 accept at face value what things are said versus  
5 not.

6 And as you have a CISA process itself  
7 allows -- basically says we strip away  
8 everything around all the processes and  
9 procedures, and we're just going to look just at  
10 the cyber vulnerability itself or the potential  
11 cyber vulnerability itself. That is how the  
12 CISA process works for these reviews, which is a  
13 good thing, I think, and -- And allowing for  
14 proper cyber investigation to make these reports  
15 in such a way is a -- is not a bad thing.

16 Now I think sometimes it's not handled the  
17 best in the world, and I think that there could  
18 be improvements made to that federal system, but  
19 I think the EAC's -- needs to be responsible in  
20 these things, and they need to move a heck of a  
21 lot faster than they have historically on them.

22 But, again, this is part of running a  
23 responsible overall system, so there's a place  
24 for all these pieces and parts to be done; and  
25 Mr. Halderman's does have part of that as -- as

1           his rationale behind it. I absolutely believe  
2           that you agree with that or believe that.

3           Q.       (By Mr. Cross) So you mentioned the CISA  
4           process sort of strips away or it doesn't look at the  
5           processes and procedures, things like physical  
6           safeguards that are in place. It's looking at the  
7           software itself and saying are there software  
8           vulnerabilities, right?

9           A.       And hardware, I think, I mean --

10          Q.       Right.

11          A.       -- 'cause you have to be able to do those  
12          things. Right.

13          Q.       But I mean, we --

14                   Isn't it a fact that we now know that  
15          the -- these other processes and procedures,  
16          including the physical safeguards that you're relying  
17          on in Georgia, that they're not adequate?

18                   Doesn't the Coffee County breach, which  
19          spanned eight days and involved -- I don't know --  
20          somewhere north of half a dozen people, that those  
21          safeguards just don't work?

22          A.       Well, Mr. Cross --

23                   MR. TYSON: I'll object to form and object  
24          to scope.

25                   Go ahead.



C E R T I F I C A T E

STATE OF GEORGIA:

COUNTY OF FULTON:

I hereby certify the foregoing transcript was taken down, as stated in the caption, and the questions and answers thereto were reduced to typewriting under my direction; that the foregoing pages 1 through 434 represent a true, complete, and correct transcript of the evidence given upon said hearing, and I further certify that I am not of kin or counsel to the parties in the case; am not in the regular employ of counsel for any of said parties; nor am I in anywise interested in the result of said case.

This, the 17th day of October, 2022.

S. JULIE FRIEDMAN, CCR-B-1476